

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TS MEDIA TECH IP, LLC,)	
)	
Plaintiff,)	Case No. 2:11-cv-00181
)	Jury
v.)	
)	
ASSOCIATED EQUIPMENT)	
CORPORATION; BACCUS)	
GLOBAL, LLC;FRONIUS USA, LLC;)	
MIDTRONICS, INC.;THE NOCO)	
COMPANY; PULSETECH)	
PRODUCTS CORPORATION; RELAX)	
TECHNOLOGY, INC. D/B/A GRANITE)	
DIGITAL; and STANLEY BLACK &)	
DECKER, INC.,)	
Defendants.)	
)	

**STIPULATED MOTION FOR
DISMISSAL WITHOUT PREJUDICE**

Plaintiff, TS Media Tech IP, LLC and Defendant The NOCO Company (“NOCO”), by and through their undersigned counsel and pursuant to Fed. R. Civ. P. 41 (a)(2) and (c), hereby move for an order dismissing all claims and counterclaims between them in this action WITHOUT PREJUDICE, with each party to bear its own costs, expenses and attorneys’ fees.

Dated: January 24, 2012

Respectfully submitted,

/s/ Andrew W. Spangler
Andrew W. Spangler
State Bar No. 24041960
Spangler Law PC
208 N. Green Street, Suite 300
Longview, TX 75601
Telephone: 903-753-9300
Facsimile: 903-553-0403
E-mail: spangler@spanglerlawpc.com

ATTORNEYS FOR PLAINTIFF
TS MEDIA TECH IP, LLC

/s/ Paul B. Kerlin
Paul B. Kerlin
State Bar No. 24044480
Vorys, Sater, Seymour and Pease LLP
700 Louisiana Street, Suite 4100
Houston, Texas 77002
Telephone: (713) 588-7000
Facsimile: (713) 588-7050
E-mail: pbkerlin@vorys.com

ATTORNEYS FOR DEFENDANT
THE NOCO COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on January 24, 2012. Any other counsel of record will be served by First Class U.S. mail on this same date.

/s/ Andrew W. Spangler
Andrew W. Spangler